

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VERSATILE HOUSEWARES & GARDENING
SYSTEMS, INC.,

Civil Action No.
09-cv-10182 (SHS) (AJP)

Plaintiff,

v.

THILL LOGISTICS, INC.;
SAS GROUP, INC.;
NAT, LLC; and
JORDAN DREW CORPORATION,

Defendants.

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SAS GROUP, INC. and JORDAN DREW
CORPORATION,

Counterclaim and Third-Party Plaintiffs,

v.

VERSATILE HOUSEWARES & GARDENING
SYSTEMS, INC. and THOMAS MOTOSKO,

Counterclaim and Third-Party Defendants.

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DEFENDANTS' REQUESTED QUESTIONS FOR VOIR DIRE

Defendants/Counterclaim and Third-Party Plaintiffs, SAS Group, Inc., Jordan Drew Corporation, Scott Sobo and Gene Sobo (collectively "Defendants"), by and through their counsel Harrington, Ocko & Monk, LLP, submit the following questions for voir dire:

Parties and Witnesses

1. Defendant SAS Group, Inc. and Jordan Drew Corporation are New York companies. Plaintiff Versatile Housewares & Gardening Systems, Inc. is a Wisconsin company. Are you familiar with or have you made purchases of products from any of these companies. If you are familiar with any of these companies, in what capacity are you familiar with them. If you purchased products from any of these companies, which products and when did you make the purchase. Do you have any experience with or knowledge about any of these companies or their products, which would affect your ability to be a fair and impartial juror in this case.

2. Plaintiff Versatile and Third-Party Motosko are represented by Michael T. Griggs and Adam L. Brookman of Boyle Fredrickson S.C., and Defendants and Third-Party Plaintiffs are represented by Kevin J. Harrington and John T.A. Rosenthal of Harrington, Ocko & Monk, LLP. Do you know any of these attorneys, or have you or any members of your family had any dealings or been represented by any of these attorneys.
3. Have you ever purchased a product as a result of an infomercial broadcast on television.
4. Regardless of whether you have purchased products sold through infomercials, do you have any views or opinions, positive or negative, about infomercials, the products sold through infomercials, or the companies that sell products through infomercials.
5. Are you familiar with the TV pitchman and celebrity, Billy Mays. Have you ever purchased products for which Billy Mays was the television spokesperson or pitchman for that product.
6. Are you familiar with the gardening tool sold under the name "Awesome Auger" through commercials featuring Billy Mays as the spokesperson. Have you ever purchased this product as a result of a television commercial featuring Billy Mays.
7. The following witnesses may be called at the trial of this matter, either in person or through use of deposition testimony. Do you know, or are you otherwise familiar with any of these witnesses.
 - a. Thomas Motosko
 - b. Scott Sobo
 - c. Edward Kurzawa
 - d. Gene Sobo
 - e. Larry Chiagouris
 - f. Todd Thill
 - g. Mary Ma
 - h. John Wang
8. Plaintiff's owner, Thomas Motosko, is disabled due to an accident, and is wheelchair bound as a result. Despite Mr. Motosko's obvious disability, can you as jurors be fair and impartial to both sides in deciding this case.

Dated: White Plains, New York
February 1, 2016

Respectfully submitted,

s/John T.A. Rosenthal
By: _____
Kevin J. Harrington (KH-5027)
John T.A. Rosenthal (JR-4819)

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